

# Exhibit 48

Martie Kutscher - Clarification re Named Plaintiff Data Letter

In re: Facebook, Inc. Consumer Privacy User Profile Litigation (Special Master)  
#1200058674

**Participants:** Daniel Garrie, Anne Lieu, ANNE DAVIS, Matthew Melamed, Franklyn Williams, Julie Law, Matthew Montgomery, Joshua Samra, Lesley Weaver, Colin Davis, Russ Falconer, Garrison Murphy, Treeva Wesley, Elizabeth Sainte, Martie Kutscher, Laura Mumm, Alexander Swanson, Adele Daniel, Benjamin Gould, David Ko, Cari Laufenberg, Sarah Skaggs, Derek Loeser, Chris Springer,

Daniel Garrie

02/01/2022 06:57 PM

Counsel, Thanks for clarifying the 12 systems and connecting the dots. It does not change the preferred next steps. Special Master Daniel Garrie

Martie Kutscher

02/01/2022 05:07 PM

Dear Special Master Garrie, We have received your Supplemental Order re Named Plaintiff Data and believe our letter may not have been clear with respect to the twelve data sources we discuss in Paragraphs 17 and 18 and from which we suggested identifying 3 for Facebook to provide a more detailed analysis. In his Order, the Special Master indicated that Facebook did not identify the twelve data systems referenced in Paragraphs 17 and 18 of its letter. The twelve systems discussed in those paragraphs are the systems listed in Paragraph 14 of the letter. As described in that paragraph, these twelve systems come from the narrowed list of 55 systems. Specifically, the twelve systems identified in Paragraph 14 are systems from the narrowed list that are connected to the Social Graph—therefore the data within them typically can be associated to particular users without the need for bespoke, system-specific code and tools. Facebook then suggested working with the Special Master to provide a detailed analysis of what would be required to identify and extract data in 3 of those systems relating to Named Plaintiffs Jason Ariciu, Bridgett Burk, Cheryl Senko, Jordan O’Hara, Samuel Armstrong, Steven Akins, Terry Fischer, and Tyler King. For the avoidance of doubt, each of the 12 systems identified in Paragraph 14 were on the original list of 149 systems identified by David Pope, Facebook provided a description of each system in its January 6 submission, and each was discussed during the January 14 hearing with Mr. Pope. We apologize for any confusion. Please let us know whether this clarification changes the Special Master’s preferred next steps. Best, Martie